

(Counsel of record listed on next page)

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

BROCADE COMMUNICATIONS  
SYSTEMS, INC., a Delaware corporation, and  
FOUNDRY NETWORKS, LLC, a Delaware  
limited liability company,

Plaintiffs and Counterclaim Defendants,

v.

A10 NETWORKS, INC., a California  
corporation; LEE CHEN, an individual;  
RAJKUMAR JALAN; an individual; RON  
SZETO, an individual; DAVID CHEUNG, an  
individual; LIANG HAN, an individual; and  
STEVEN HWANG, an individual,

Defendants and Counterclaimants.

Case No. 10-cv-03428 LHK

**[PROPOSED] STIPULATION TO  
MODIFY PROTECTIVE ORDER**

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13 Attorneys for Defendant

14 LIANG HAN

1           **IT IS HEREBY STIPULATED** by and among Plaintiffs Brocade Communications  
 2 Systems, Inc. (“Brocade”) and Foundry Networks, LLC (“Foundry”) and Defendants A10  
 3 Networks, Inc., Lee Chen, Rajkumar Jalan, Ron Szeto, David Cheung, and Liang Han  
 4 (collectively, “the parties”):

5           (1) To expedite discovery, the source code previously deposited at Iron Mountain by  
 6 the parties shall be transferred to the offices of the Parties’ Counsel until this case is resolved.

7           (2) The source code shall be maintained at the parties’ counsel’s offices only on  
 8 secured computers in a secured room without Internet access or network access to other  
 9 computers, and the Receiving Party shall not copy, remove, or otherwise transfer any portion of  
 10 the source code onto any recordable media or recordable device.

11           (3) The Receiving Party shall maintain a record of any individual who has inspected  
 12 any portion of the source code in electronic or paper form. The Receiving Party shall maintain all  
 13 paper copies of any printed portions of the source code in a secured, locked area. The Receiving  
 14 Party shall not create any electronic or other images of the paper copies and shall not convert any  
 15 of the information contained in the paper copies into any electronic format. The Receiving Party  
 16 shall only make additional paper copies if such additional copies are (1) necessary to prepare  
 17 court filings, pleadings, or other papers (including a testifying expert’s expert report), (2)  
 18 necessary for deposition, or (3) otherwise necessary for the preparation of its case. Any paper  
 19 copies used during a deposition shall be retrieved by the Producing Party at the end of each day  
 20 and must not be given to or left with a court reporter or any other individual. Any paper copies of  
 21 source code shall be immediately marked “HIGHLY CONFIDENTIAL – SOURCE CODE”  
 22 pursuant to Paragraph 2.10 of the Protective Order (D.I. 94).

23           (4) Upon request of the deposing party, a computer with the source code of the party  
 24 being deposed will be made available during deposition with a connected printer to allow for any  
 25 additional source code needed during the deposition to be printed out. Any source code that is  
 26 printed out in this manner that the Receiving Party wishes to keep after the deposition shall be  
 27 subject to the provisions of Paragraph (3) above.

1                   **IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.**

2  
3           Dated: November 29, 2011

ORRICK, HERRINGTON & SUTCLIFFE LLP

4  
5                   /s/ Fabio E. Marino

6           FABIO E. MARINO

7           Attorneys for Plaintiffs and Counterclaim Defendants  
8           BROCADE COMMUNICATIONS SYSTEMS, INC.  
9           AND FOUNDRY NETWORKS, LLC

10  
11           Dated: November 29, 2011

HAIGHT BROWN & BONESTEEL LLP

12                   /s/ Ann H. Liroff

13           ANN H. LIROFF

14           Attorneys for Defendant  
15           DAVID CHEUNG

16  
17           Dated: November 29, 2011

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18                   /s/ Scott R. Mosko

19           SCOTT R. MOSKO

20           Attorneys for Defendants  
21           A10 NETWORKS, INC., LEE CHEN, RAJKUMAR  
22           JALAN, RON SZETO, AND STEVE HWANG

23  
24           Dated: November 29, 2011

LOSCH & EHRLICH

25                   /s/ Joseph Ehrlich

26           JOSEPH EHRLICH

27           Attorneys for Defendant  
28           LIANG HAN

**Filer's Attestation:** Pursuant to General Order No. 45, §X(B), I attest under penalty of perjury that concurrence in the filing of the document has been obtained from its signatory.

Dated: November 29, 2011

Respectfully submitted,

/s/ *Fabio E. Marino*  
 FABIO E. MARINO

## ORDER

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated: November 29, 2011

*Lucy H. Koh*  
THE HONORABLE LUCY H. KOH  
United States District Judge